## UNITED STATES DISTRICT COURT 1 CENTRAL DISTRICT OF CALIFORNIA 2 DREAM COLLECTIVE, INC., a California 3 corporation; Case No. 2:15-cy-07871 4 Plaintiff, 5 VS. STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3) 6 MADEWELL, INC, a Delaware corporation; J. CREW, INC., a Delaware corporation; J. 7 CREW GROUP, INC., a Delaware Complaint served: October 24, 2015 corporation; MAURICE MAX, INC. D/B/A Current response date: November 14, 2015 8 LEE ANGEL., a New York Corporation; and New response date: December 9, 2015 DOES 1 through 10, inclusive, 9 Defendants. 10 11 IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for DREAM COLLECTIVE, INC., ("Plaintiff") and MADEWELL, INC., J. CREW, 12 INC., J. CREW GROUP, INC. and MAURICE MAX, INC. D/B/A LEE ANGEL ("Defendants") that the deadline for Defendants to answer or otherwise respond to Plaintiff's Complaint dated 13 October 7<sup>th</sup>, 2015 is extended through to December 9<sup>th</sup>, 2015 14 IT IS FURTHER STIPULATED AND AGREED that Defendants hereby waive all 15 defenses relating to personal jurisdiction, including, without limitation, in connection with defects in service, subject matter jurisdiction and venue and agrees not to make any motion to 16 dismiss or contest this action on the basis of any such waived defense. 17 IT IS FURTHER STIPULATED AND AGREED by and between the undersigned 18 attorneys for Plaintiff and Defendants that PDF and facsimile signatures shall be deemed original 19 signatures for all purposes under this Stipulation. 20 Dated: October 29, 2015 New York, New York 21 22 **ERIKSON LAW GROUP** LAZARUS & LAZARUS, P.C. Attorneys for Plaintiff Attorneys for Defendant Maurice 23 Max, Inc. 24 By: /s/ David Erikson By: /s/ Harlan M. Lazarus 25 Harlan M. Lazarus, Esq. David A. Erikson 240 Madison Ave. 8<sup>th</sup> Fl 200 North Larchmont Boulevard 26

STIPULATION

New York, NY 10016.

(212) 889-7400

Los Angeles, California 90004

(323) 465-3100

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